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April 29, 2019

**VIA ECF**

Honorable Vera M. Scanlon  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States v. Raniere, et al.*, 18-cr-204 (NGG)

Dear Judge Scanlon:

In advance of the conference scheduled today for 2:15 PM, we write to inform the Court of the following developments:

- Judge Garaufis ruled on Friday on the Privilege Review Team's appeal of certain of Your Honor's Privilege Orders, addressing any outstanding issues as to the status of NXIVM and affirming Your Honor's orders;
- The Privilege Review Team informed counsel for Defendant Bronfman that it does not seek to litigate the remaining disputed Bronfman documents at this time;
- The Privilege Review Team informed counsel for NXIVM that it does not seek to litigate the remaining disputed NXIVM documents at this time.

As there are no disputes requiring the Court's intervention at this time, we respectfully request that the conference scheduled for this afternoon be adjourned *sine die*. We have conferred with the privilege review team and counsel for NXIVM, who consent to this request.

Respectfully submitted,

/s/

Kathleen E. Cassidy

**HAFETZ & NECHELES LLP**

cc: AUSA Shannon Jones, Privilege Review Attorney (via ECF)  
AUSA Philip Pilmar, Privilege Review Attorney (via ECF)  
AUSA Alicia Washington, Privilege Review Attorney (via ECF)  
Michael Sullivan, Esq. (via email)